

## **REMARKS**

Applicants have amended claim 15 and cancelled claims 23-25. Claims 15, 17, and 19-22 are now pending. No new matter has been added by these amendments.

### **Rejections under 35 USC 102**

Applicants respectfully request withdrawal of the rejection of claim 15 as being anticipated by US Patent No 6,071,573 to Koemetzopoulos et al. In particular, the applicants respectfully disagree with the Examiner's reasoning that non-fluorine containing compounds would be obvious. Koemetzopoulos requires that the pre-coat contain a fluorine component. As acknowledged by the Examiner, Koemetzopoulos is silent as to the addition of chlorine and bromine. However, the Examiner asserts that it would have been obvious to utilize chlorine and bromine despite the silence of Koemetzopoulos as to these features. The Applicants respectfully request that the Examiner provide motivation to ignore the specific teaching of Koemetzopoulos to use fluorine. Applicants respectfully assert that there is no motivation to use bromine or chlorine.

Furthermore, the Examiner has rejected claims 23-25 under 102(e) and the rejection should be based under section 103. The features of claims 23 and 25 have been incorporated into amended claim 15. Thus, claim 15 is not anticipated by Koemetzopoulos. The Examiner has asserted that closely related homologs and analogs may create a prima facie case of obviousness in chemistry. Homologs and analogs are related to compounds with similar structures. A homolog is a series of organic compounds with a similar general formula, possessing similar chemical properties due to the presence of the same functional group, and shows a gradation in physical properties as a result of increase in molecular size and mass. An analog is a compound in which one or more individual atoms have been replaced, either with a different atom, or with a different functional group. These

compounds have nothing to do with different elements such as fluorine vis a vis chlorine and bromine, which all have different structures. Therefore, the Examiner's reference to analogs and homologs is inappropriate in this instance and there is no basis for ignoring the explicit teaching of Koemetzopoulos to use fluorine.

In view of the foregoing, Applicants respectfully submit that all of the pending claims are in condition for allowance. A notice of allowance is respectfully requested. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 774-6921. If any additional fees are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees to Deposit Account No. 50-0805 (Order No. LAM2P410). A copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
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